Evan R. Chesler Peter T. Barbur Elizabeth L. Grayer Richard J. Stark David R. Marriott CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Document 99

BROADCOM CORPORATION,

Civil Action No. 05-3350 (MLC) (JJH)

Plaintiff,

QUALCOMM INCORPORATED,

v.

Defendant.

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant Qualcomm Incorporated ("Defendant") will move before this Court for an order admitting Gerald A. Ford, Radu L. Lelutiu, Jeremy N. Sheff, Karl C. Huth, Natasha S. Guinan, Christopher A. Stanton, Duane L. Loft and Jared B. Shirck of the law firm of Cravath, Swaine & Moore LLP, and Philip L. Blum of the law firm of Bingham McCutchen LLP pro hac vice in this action.

In support of the motion, Defendant relies on the Accompanying Affidavits of Gerald A. Ford, Radu L. Lelutiu, Jeremy N. Sheff, Karl C. Huth, Natasha S. Guinan, Christopher A. Stanton, Duane L. Loft, Jared B. Shirck and Philip L. Blum. Defendant respectfully submits that no brief is necessary in connection with this motion, in as much as the bases of this application are set forth in the accompanying Affidavits.

Dated: October 16, 2007

McCARTER & ENGLISH, LLP

By: s/William J. O'Shaughnessy
William J. O'Shaughnessy
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444

CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, NY 10019 (212) 474-1000

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION, :

Civil Action No. 05-3350 (MLC) (JJH)

Page 1 of 3

Plaintiff,

.

V. :

.

QUALCOMM INCORPORATED,

.

Defendant. :

CERTIFICATION OF WILLIAM J. O'SHAUGHNESSY
IN SUPPORT OF *PRO HAC VICE* ADMISSION OF
GERALD A. FORD, RADU L. LELUTIU, JEREMY N. SHEFF,
KARL C. HUTH, NATASHA S. GUINAN, CHRISTOPHER A. STANTON,
DUANE L. LOFT, JARED B. SHIRCK AND PHILIP L. BLUM

WILLIAM J. O'SHAUGHNESSY, of full age, certifies as follows:

- I am a member of the bar of the State of New Jersey and of McCarter & English,
 LLP, counsel for Defendant Qualcomm Incorporated in this action.
- 2. I make this Certification in support of the application of Gerald A. Ford, Radu L. Lelutiu, Jeremy N. Sheff, Karl C. Huth, Natasha S. Guinan, Christopher A. Stanton, Duane L. Loft, Jared B. Shirck and Philip L. Blum for admission to the bar of this Court *pro hac vice*.
- 3. Affidavits from Mr. Ford, Mr. Lelutiu, Mr. Sheff, Mr. Huth, Ms. Guinan, Mr. Stanton, Mr. Loft, Mr. Shirck and Mr. Blum in support of their respective applications for admission to the bar of this Court *pro hac vice* have also been submitted.
- 4. Mr. Ford, Mr. Lelutiu, Mr. Sheff, Mr. Huth, Ms. Guinan, Mr. Stanton, Mr. Loft, Mr. Shirck and Mr. Blum have been advised of their obligations to comply with the Rules of Professional Conduct adopted by the New Jersey Supreme Court, and of Local Rule 101.1(c) which governs the admission of counsel *pro hac vice*.
- 5. Mr. Ford, Mr. Lelutiu, Mr. Sheff, Mr. Huth, Ms. Guinan, Mr. Stanton, Mr. Loft, Mr. Shirck and Mr. Blum will be associated with attorneys from the firm of McCarter & English, LLP in the defense of this matter, and a member of McCarter & English, LLP will sign all pleadings, briefs, and other papers filed with the Court.

6. Our adversary, Broadcom Corporation, through its attorney, David Stone of Boies, Schiller & Flexner LLP, has consented to the *pro hac vice* admission of Mr. Ford, Mr. Lelutiu, Mr. Sheff, Mr. Huth, Ms. Guinan, Mr. Stanton, Mr. Loft, Mr. Shirck and Mr. Blum. I certify under penalty of perjury that the foregoing is true and correct.

s/ William J. O'Shaughnessy William J. O'Shaughnessy

DATED: October 16, 2007

v.

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	Civil Action No. 05 2250 (MIC) (IIII)
Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
v.	:	
QUALCOMM INCORPORATED,	:	
Defendant.	:	
STATE OF NEW YORK)		
COUNTY OF NEW YORK)		

AFFIDAVIT OF GERALD A. FORD IN SUPPORT OF ADMISSION PRO HAC VICE

Gerald A. Ford, being duly sworn, deposes and says:

1. I am a Senior Attorney at the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make

this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 1976 graduate of the University of San Francisco School of Law. I was admitted to practice in the State of New York in 1982. I am also admitted to practice before the United States Court of Federal Claims (1999), the United States District Court for the Southern District of New York (1985), the United States District Court for the Eastern District of New York (1991), the United States Court of Appeals for the Federal Circuit (1990) and the United States Court of Appeals for the Fifth Circuit (1990).
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Sworn and subscribed to before me, a notary public of the State of New York, this ____ day of October, 2007.

ROBERT B.ZWILLICH
Notary Public, State of New York
No. 012W4630959
Qualified in New York County
Commission Expires October 31, 2010

Evan R. Chesler Peter T. Barbur Elizabeth L. Grayer Richard J. Stark David R. Marriott CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	05 2250 (141 (2) (141)
Plaintiff,	: Civil Action No	o. 05-3350 (MLC) (JJH)
v.	:	
QUALCOMM INCORPORATED,	:	
Defendant.	:	
STATE OF NEW YORK)		
OUNTY OF NEW YORK)		

AFFIDAVIT OF RADU A. LELUTIU IN SUPPORT OF ADMISSION PRO HAC VICE

Radu A. Lelutiu, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- I am a 2003 graduate of Columbia Law School. I was admitted to practice in the State of New York in 2004.
 - 4. My principal practice involves general commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Sworn and subscribed to before me, a notary public of the State of New York, this ____ day of October, 2007.

ROBERT B.ZWILLICH
Notary Public, State of New York
No. 01ZW4630959
Qualified in New York County
Commission Expires October 31, 2010

-3-

Evan R. Chesler Peter T. Barbur Elizabeth L. Grayer Richard J. Stark David R. Marriott CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	: Civil Action N	No. 05-3350 (MLC) (JJH)
Plaintiff,	: CIVII / KOLIONI I	(0. 05 5550 (1.220)
V.	:	
QUALCOMM INCORPORATED,	;	
Defendant.	:	
STATE OF NEW YORK)) ss.		
COUNTY OF NEW YORK)		

AFFIDAVIT OF JEREMY N. SHEFF IN SUPPORT OF ADMISSION PRO HAC VICE

Jeremy N. Sheff, being duly sworn, deposes and says:

I am an attorney associated with the law firm of Cravath, Swaine & Moore LLP. 1.

My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I

make this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 2002 graduate of Harvard Law School. I was admitted to practice in the State of New York in 2003. I am also admitted to practice before the United States District Court for the Southern District of New York (2004).
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Jeremy N. Sheff.

Sworn and subscribed to before me, a notary public of the State of New York, this _9th_ day of October, 2007.

KEITH S. KAPLAN
Notary Public, State of New York
No. 01 KA6062463
Qualified in New York County
Commission Expires Aug. 6, 2009

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
v.	:	
QUALCOMM INCORPORATED,	:	
Defendant.	:	
STATE OF NEW YORK)		
OUNTY OF NEW YORK)		

AFFIDAVIT OF KARL C. HUTH IN SUPPORT OF ADMISSION PRO HAC VICE

Karl C. Huth, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make

this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 2004 graduate of Columbia Law School. I was admitted to practice in the State of New York in 2005. I am also admitted to practice before the United States District Court for the Southern District of New York (2005) and the United States District Court for the Eastern District of New York (2005).
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Karl C. Huth

Sworn and subscribed to before me, a notary public of the State of New York, this _____ day of October, 2007.

KEITH S. KAPLAN
Notary Public, State of New York
No. 01 KA6062463
Qualified in New York County
Commission Expires Aug. 6, 2009

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	Ciril Action No. 05 2250 (MIC) (IIII)
Plaintiff,	: Civil Action No. 05-3350 (MLC) (JJH)
v.	: :
QUALCOMM INCORPORATED,	: :
Defendant.	: :
STATE OF NEW YORK)	
) ss. COUNTY OF NEW YORK)	

AFFIDAVIT OF NATASHA S. GUINAN IN SUPPORT OF ADMISSION PRO HAC VICE

Natasha S. Guinan, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make

this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 2004 graduate of the Fordham University School of Law. I was admitted to practice in the State of New York in 2005.
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Matasha S. Guinan

Sworn and subscribed to before me, a notary public of the State of New York, this _____day of October, 2007.

Notary Public, State of New York
No. 31-4638498
Qualified in New York County
Commission Expires March 30, 2010

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Plaintiff,	: Civil Action No. 05-3350 (MLC) (JJH)
v. QUALCOMM INCORPORATED,	: : :
Defendant.	· : :
STATE OF NEW YORK)) ss. COUNTY OF NEW YORK)	

AFFIDAVIT OF CHRISTOPHER A. STANTON IN SUPPORT OF ADMISSION PRO HAC VICE

Christopher A. Stanton, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make

this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me pro hac vice for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- I am a 2006 graduate of Northwestern University School of Law. I was admitted 3. to practice in the State of New York in 2007. I am also admitted to practice before the United States District Court for the Southern District of New York (2007).
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me pro hac vice for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- I will make any required payment to the New Jersey Lawyers' Fund for Client 7. Protection.

Christopher A. Stanton

Sworn and subscribed to before me, a notary public of the State of New York, this 9th day of October, 2007.

DORIS SCHULDT
Notary Public, State of New York
No. 31-4638498
Qualified in New York County
Commission Expires March 30, 2010

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION, Plaintiff,	: Civil Action No. 05-3350 (MLC) (JJH)
v.	:
QUALCOMM INCORPORATED,	:
Defendant.	;
STATE OF NEW YORK)) ss. COUNTY OF NEW YORK)	

AFFIDAVIT OF DUANE L. LOFT IN SUPPORT OF ADMISSION PRO HAC VICE

Duane L. Loft, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My

business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I swear

to this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing it in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 2005 graduate of Fordham University School of Law. I was admitted to practice in the State of New York in 2006. I am also admitted to practice before the United States District Court for the Southern District of New York (2007).
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Sworn and subscribed to before me, a notary public of the State of New York, this _9 +h day of October, 2007.

ROBERT B.ZWILLICH
Notary Public, State of New York
No. 012W4630959
Qualified in New York County
Commission Expires October 31, 2010

Evan R. Chesler
Peter T. Barbur
Elizabeth L. Grayer
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	G' '1 4 4' - N. 05 2250 (157 6) (777)
Plaintiff,	: :	Civil Action No. 05-3350 (MLC) (JJH)
v.	; ;	
QUALCOMM INCORPORATED,	:	
Defendant.	:	
STATE OF NEW YORK)) ss.		
COUNTY OF NEW YORK)		

AFFIDAVIT OF JARED B. SHIRCK IN SUPPORT OF ADMISSION PRO HAC VICE

Jared B. Shirck, being duly sworn, deposes and says:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make

this Affidavit in support of the motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

- 2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- 3. I am a 2006 graduate of Harvard Law School. I was admitted to practice in the State of New York in 2007.
 - 4. My principal practice involves civil and commercial litigation.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Sworn and subscribed to before me, a notary public of the State of New York, this ______ day of October, 2007.

DORIS SCHULDT
Notary Public, State of New York
No. 31-4638498
Qualified in New York County
Commission Expires March 30, 2010

Evan R. Chesler Richard J. Stark David R. Marriott Peter T. Barbur Elizabeth L. Grayer CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	: Civil Action No. 05-3350 (MLC) (JJH)
Plaintiff,	:
v.	
QUALCOMM INCORPORATED,	
Defendant.	: · · · · · · · · · · · · · · · · · · ·
STATE OF NEW YORK)	
) ss. COUNTY OF NEW YORK)	

AFFIDAVIT OF PHILIP L. BLUM IN SUPPORT OF **ADMISSION PRO HAC VICE**

Philip L. Blum, being duly sworn, deposes and says:

I am counsel at the law firm of Bingham McCutchen LLP. My business address is 399 Park Avenue, New York, New York 10022. I make this Affidavit in support of the

motion of Defendant Qualcomm Incorporated ("Qualcomm") to admit me pro hac vice for purposes of representing them in this matter.

- I am a member in good standing of the bar of the State of New York, the state of 2. which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.
- I am a 1999 graduate of Hofstra University School of Law. I was admitted to 3. practice in the State of New York in 2000. I am also admitted to practice before the United States District Court for the Southern District of New York (2000), the United States District Court for the Eastern District of New York (2000), the United States District Court for the Western District of New York (2003), and the United States Court of Appeals for the Second Circuit (2005).
 - My principal practice involves civil and commercial litigation. 4.
- 5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me pro hac vice for these purposes.
- 6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.
- 7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.

Philip L.

Sworn and subscribed to before me, a notary public of the State of New York, this 4th day of October, 2007.

DAVID MARCUS
Notary Public, State of New York
No. 4873948
Qualified in New York County
Commission Expires Oct. 20, 2010

Evan R. Chesler Peter T. Barbur Elizabeth L. Grayer Richard J. Stark David R. Marriott CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,

Civil Action No. 05-3350 (MLC) (JJH)

Plaintiff,

v.

QUALCOMM INCORPORATED,

Defendant.

ORDER GRANTING ADMISSION PRO HAC VICE

This matter having been opened to the Court by McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated, seeking an Order admitting Gerald A. Ford, Esq., Radu L. Lelutiu, Esq., Jeremy N. Sheff, Esq., Karl C. Huth, Esq., Natasha S. Guinan, Esq., Christopher A. Stanton, Esq., Duane L. Loft, Esq., Jared B. Shirck, Esq. and Philip L. Blum, Esq., attorneys

v.

at law of the State of New York *pro hac vice*, and the local counsel for Defendant (McCarter & English, LLP) having represented that Plaintiff has no objection to the entry of the within Order;

IT IS on this ______ day of ______, 2007,

ORDERED as follows:

- 1. Gerald A. Ford, Esq., Radu L. Lelutiu, Esq., Jeremy N. Sheff, Esq., Karl C. Huth, Esq., Natasha S. Guinan, Esq., Christopher A. Stanton, Esq., Duane L. Loft, Esq., Jared B. Shirck, Esq. and Philip L. Blum, Esq. be and are hereby admitted *pro hac vice* to appear in this matter for all purposes on behalf of Defendant Qualcomm Incorporated.
- 2. Gerald A. Ford, Esq., Radu L. Lelutiu, Esq., Jeremy N. Sheff, Esq., Karl C. Huth, Esq., Natasha S. Guinan, Esq., Christopher A. Stanton, Esq., Duane L. Loft, Esq., Jared B. Shirck, Esq. and Philip L. Blum, Esq. are required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting his or her standing at the bar of any other court.
- 3. Gerald A. Ford, Esq., Radu L. Lelutiu, Esq., Jeremy N. Sheff, Esq., Karl C. Huth, Esq., Natasha S. Guinan, Esq., Christopher A. Stanton, Esq., Duane L. Loft, Esq., Jared B. Shirck, Esq. and Philip L. Blum, Esq. are deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against him or her or their firm that may arise out of their participation in this matter.
- 4. William J. O'Shaughnessy, Esq. of the firm of McCarter & English, LLP, and a member of the bar of this Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(3).
- 5. In accordance with Local Civil Rule 101.1(c)(2), Gerald A. Ford, Esq., Radu L. Lelutiu, Esq., Jeremy N. Sheff, Esq., Karl C. Huth, Esq., Natasha S. Guinan, Esq., Christopher

A. Stanton, Esq., Duane L. Loft, Esq., Jared B. Shirck, Esq. and Philip L. Blum, Esq. will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a).

Honorable John J. Hughes, U.S.M.J.

v.

Evan R. Chesler Peter T. Barbur Elizabeth L. Grayer Richard J. Stark David R. Marriott CRAVATH, SWAINE & MOORE LLP Worldwide Plaza 825 Eighth Avenue New York, New York 10019 (212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,

Civil Action No. 05-3350 (MLC) (JJH)

Plaintiff,

QUALCOMM INCORPORATED,

v.

Defendant.

CERTIFICATION OF SERVICE

RICHARD HERNANDEZ, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and am associated with the firm of McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated.

2. On October 16, 2007, I caused to be delivered by ECF copies of the foregoing to the following:

> David S. Stone, Esq. Boies, Schiller & Flexner LLP 150 John F. Kennedy Parkway Short Hills, New Jersey 07078

Steven John Kaiser, Esq. Cleary Gottlieb Steen & Hamilton LLP 2000 Pennsylvania Avenue, NW Washington, DC 20006

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

> s/ Richard Hernandez Richard Hernandez

DATED: October 16, 2007

v.